

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SCOTT D.H. REDMAN, individually and on behalf)  
of all others similarly situated, )

Plaintiff, )

v. )

MICHAEL ROBERT ENTERPRISES, INC., )  
d/b/a Chicago Northside Toyota and d/b/a Chicago )  
Northside Scion, an Illinois corporation, )

Defendant. )

No. 10 CV 2465

Magistrate Arlander Keys  
(consent filed)

**JOINT SUBMISSION OF MATERIALS IN SUPPORT OF  
FINAL APPROVAL OF THE CLASS ACTION SETTLEMENT AGREEMENT**

Plaintiff Scott D.H. Redman and Defendant Michael Robert Enterprises, Inc., by and through their respective attorneys, hereby state as follows:

1. On April 25, 2011, this Court entered a Preliminary Approval Order (“Order”) preliminarily approving the parties’ proposed Class Action Settlement Agreement and Release (“Agreement”) [DE 87], a copy of which is attached hereto as Exhibit A.

2. Pursuant to the terms of the Agreement and the Order, notice was provided to the Class by first class mail, postage prepaid. *See* Affidavit of Michael Sutherland at ¶3, a copy of which is attached hereto as Exhibit B and incorporated herein by reference.

3. In response to the Class Notice, 0 class members objected to the settlement and seven (7) class members excluded themselves from the settlement. *See* Affidavit of Paul F. Markoff at ¶---, a copy of which is attached hereto as Exhibit C and incorporated herein by reference.

4. Pursuant to the Agreement, Defendant has agreed to pay Class Counsel \$122,500 in attorneys' fees and costs, conditioned upon the Court's approval of such fees and costs, in support of which Class Counsel has submitted certifications by Paul F. Markoff and Lance A. Raphael (Exhibits C and D, respectively), which identify attorneys' fees of \$124,130 and costs of \$825.29.

5. Plaintiff incorporates herein by reference Plaintiff's Memorandum in Support of Joint Motion for Preliminary Approval of Class Action Settlement Agreement [DE 81].

6. The parties, therefore, request that this Court grant final approval to the Agreement and enter the proposed Final Approval Order, attached as Exhibit E.

WHEREFORE, the parties request that this Court enter the parties' proposed Final Approval Order.

SCOTT D.H. REDMAN,  
Plaintiff,

MICHAEL ROBERT ENTERPRISES, INC.  
d/b/a Chicago Northside Toyota and d/b/a  
Chicago Northside Scion,  
Defendant,

By: s/ Paul F. Markoff  
One of his attorneys

By: s/ Erika N.L. Harold  
One of its attorneys

Lance A. Raphael  
Allison A. Krumhorn  
The Consumer Advocacy Center, P.C.  
180 W. Washington St., Ste. 700  
Chicago, IL 60602  
312.782.5808

Ira M. Levin  
Erika N.L. Harold  
Burke Warren MacKay & Serritella, P.C.  
330 N. Wabash Ave., 22<sup>nd</sup> Fl.  
Chicago, IL 60611  
312.840.7000

Paul F. Markoff  
Karl G. Leinberger  
Markoff Leinberger LLC  
180 W. Washington St., Ste. 700  
Chicago, IL 60602  
312.726.4162

**CERTIFICATE OF SERVICE**

I certify that I served a copy of this *Joint Submission of Materials in Support of Final Approval of the Class Action Settlement Agreement* upon the following individuals electronically by using the CM/ECF system on this 18<sup>th</sup> day of July, 2011:

Ira M. Levin  
Erika N.L. Harold  
David Y. Paek  
Burke, Warren, Mackay & Serritella, P.C.  
330 North Wabash Avenue, 22nd Floor  
Chicago Illinois 60611

s/ Paul F. Markoff